

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Marcus A. Little	:	Chapter 13
Shanyel I. Little	:	
	:	
Debtor	:	Case No.: 20-11291-mdc

MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now, Marcus and Shanyel Little, hereinafter referred to as “Debtors” and move this Honorable Court to vacate its December 13, 2020 Order Modifying Section 362 Automatic Stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about March 2, 2020.
2. The Chapter 13 bankruptcy matter was assigned case number 20-11291.
3. The Chapter 13 Plan has not yet been confirmed by this Honorable Court.
4. On or about November 13, 2020, the Mortgagee filed a Motion for Relief from Stay of real property located at 3059 Bambrey Street, Philadelphia, PA 19132.
5. On or about December 13, 2020 this Court entered an Order in favor of U.S. Bank for Relief from the Automatic Stay.
6. Debtors failed to respond to counsel’s communication regarding the subject Motion for Relief and therefore the Motion was left unanswered.
7. The Debtors are desirous of keeping their real property located at 3059 Bambrey Street, Philadelphia, PA 19132 and are prepared to pay any and all post-petition delinquencies prior to the hearing on the instant Motion.

WHEREFORE, for the reasons stated herein, the Debtor respectfully request that this Honorable Court Vacate its December 13, 2020 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: January 6, 2021

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
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